

EXHIBIT C

From: Swendsboe, Krystal
Sent: Monday, January 10, 2022 10:10 AM
To: Andrew R. Kurland; Obermeier, Stephen; Lane, William; Brater, Randall; Roman, Eric; Farooqui, Mohammed; Collins, Nicholas L.; Jeffrey Udell; Adam Cohen; Martin Njoroge; Jake Gardener; cfax@rwllaw.com
Cc: Henry Brownstein; Jacob Benson; Daniel R. Benson
Subject: RE: Broidy Capital Management v. Muzin

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Hi Andrew,

Thank you for your emails. I write on behalf of the defendants to respond to your email below, as well as the email that you sent just to counsel for the Stonington Defendants at 3:20pm on Friday, January 7, 2022.

First, regarding the subpoenas issued by the Stonington Defendants, we agree to extend the deadline to respond until Friday, January 14. Responsive materials may be delivered electronically to myself, Steve Obermeier, and Bill Lane.

Second, we are available to meet and confer on Defendants' discovery responses and objections this Thursday or Friday. At the same time, we would also like to meet and confer regarding Broidy's discovery responses to the Stonington Defendants and Howard. Among other things, we would like to discuss (1) Broidy's failure to respond to vast numbers of requests based on vague "relevance" objections, (2) Broidy's intent to provide no documents or information prior to December 2017, when we believe there is discoverable information prior to that date, and (3) Broidy's failure to provide any specific information regarding trade secrets or damages, when Broidy pled those issues himself, and only Broidy would be in possession of that information.

Please let us know your availability on Thursday or Friday, and we can get something scheduled.

Thanks for your assistance.

Best,
Krystal



Krystal B. Swendsboe
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Please update your records to reflect our new office address.

From: Andrew R. Kurland <AKurland@kasowitz.com>

Sent: Monday, January 10, 2022 9:05 AM

To: Obermeier, Stephen <SObermeier@wiley.law>; Lane, William <WLane@wiley.law>; Brater, Randall <Randall.Brater@arentfox.com>; Roman, Eric <Eric.Roman@arentfox.com>; Farooqui, Mohammed <Mohammed.Farooqui@arentfox.com>; Collins, Nicholas L. <Nicholas.Collins@arentfox.com>; Jeffrey Udell <judell@wmhlaw.com>; Adam Cohen <acohen@wmhlaw.com>; Martin Njoroge <MNjoroge@wmhlaw.com>; Jake Gardener <jgardener@wmhlaw.com>; Swendsboe, Krystal <KSwendsboe@wiley.law>; cfax@rwllaw.com

Cc: Broidy Team <Broidy_Team@kasowitz.com>

Subject: RE: Broidy Capital Management v. Muzin

External Email

Good morning. Please let us know if you have time for the call this afternoon. If not today, please let us know your availability tomorrow. Thank you.

Andrew R. Kurland
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From: Andrew R. Kurland

Sent: Friday, January 7, 2022 3:29 PM

To: Obermeier, Stephen <SObermeier@wiley.law>; Lane, William <WLane@wiley.law>; Brater, Randall <Randall.Brater@arentfox.com>; Roman, Eric <Eric.Roman@arentfox.com>; Farooqui, Mohammed <Mohammed.Farooqui@arentfox.com>; Collins, Nicholas L. <Nicholas.Collins@arentfox.com>; Jeffrey Udell <judell@wmhlaw.com>; Adam Cohen <acohen@wmhlaw.com>; Martin Njoroge <MNjoroge@wmhlaw.com>; Jake Gardener <jgardener@wmhlaw.com>; Swendsboe, Krystal <KSwendsboe@wiley.law>; cfax@rwllaw.com

Cc: Broidy Team <Broidy_Team@kasowitz.com>

Subject: Broidy Capital Management v. Muzin

Counsel,

We would like to schedule a call to discuss defendants' responses and objections to plaintiffs' discovery requests, including in particular defendants' overall objections related to (i) claims of sovereign or diplomatic immunity, and (ii) to producing after certain cutoff dates in 2018 what in our view is relevant, discoverable information.

Please let us know if you have availability for a call on Monday Jan. 10 between 11 AM – 1 PM eastern, or between 3 – 6 PM eastern.

Thank you.

- Andrew

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